

7364-103

8/19/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Leighann Richardson, Senior Regulatory Associate  
GLB Pool & Spa, an Arch Chemicals, Inc. business  
1200 Bluegrass Lakes Parkway  
Alpharetta, GA 30004

AUG 19 2014

Subject: FQPA 332: Minor Label Changes per PR Notice 98-10  
**AW42**  
EPA Registration Number: **7364-103**  
Application Date: August 1, 2014  
Application Receipt: August 4, 2014

Dear Ms. Richardson:

This acknowledges receipt of your Notification application, submitted under the provisions of FIFRA 3(c) 9 and PR Notice 98-10.

Purpose of the Notification:

GLB Pool & Spa is submitting the following minor Product Label changes for **EPA Reg. No. 7364-103**:

First Aid and Precautionary Statements have been to Page 2. A Note to reviewer and the following referral statement have been added to Page 1: "Read all Precautionary [and First Aid] Statements on [back] [side] [right] [left] panel before use."

The reason we are asking for this allowance is due to the size of some of our packaging. The smaller sizes present a challenge to fit all of the required language on the front panel. Our note to reviewer includes the statement, "If the First Aid Statements are Precautionary Statements." The intent off that statement was that when space was not an issue, the First Aid Statements would appear on the front panel.

On Page 3, under Water Balance, add "brand name" as an option.

On Page 5, add the following marketing statements:

- For sparkling clear spa water
- Fast-dissolving brominating sanitizer
- Fast-dissolving bromine sanitizer
- Sanitizes and disinfects spa water
- Routine care

Sanitizer

On Page 6, add trademark statements, customer service number and brand websites.

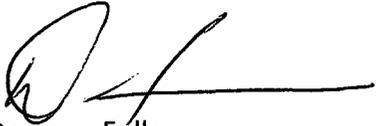
If you wish to retain reference to the Company's Website on your Product Label, then please be aware that such a reference transforms the Website into Labeling under the Federal Insecticide, Fungicide and Rodenticide Act sec 2 (p) (2) and then the Website is subject to review by the Agency. If the Website content is false or misleading, the Product would be misbranded and its sale or distribution unlawful to sell or distribute under FIFRA section 12 (a) (1) (E). In addition, regardless of whether a website is referenced on your Product's Label, claims made on the Website may not substantially differ from those claims approved through the registration process. Although EPA has not yet determined the extent to which it will routinely review Company Websites, if the Agency finds or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from claims approved through the registration process, the Website may be referred to the EPA'S Office of Enforcement and Compliance Assurance.

General Comments:

Based on the review of the information submitted, the following comments apply. The Notification is **Acceptable**. A copy of the accepted Notification is attached in **Regulatory File Jacket 7634-103** for future reference.

If you have questions or concerns with regard to this Agency Letter, please contact Killian Swift by email at [Swift.Killian@epa.gov](mailto:Swift.Killian@epa.gov) and by telephone at **703-308-6346**. When you are submitting information or data in response to this Agency Letter, please send a copy of this Agency Letter with your response in order to facilitate processing.

Sincerely yours,



Demson Fuller  
EPA Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division 7510P





Note to reviewer:  
[Items in brackets [AAA] are optional and may/may not be included on final label]  
{Items in braces {AAA} are for information purposes and will not appear on final label}

**AW42**

**NOTIFICATION**  
Date Reviewed: \_\_\_\_\_ **AUGUST 18, 2014**  
Reviewed By: \_\_\_\_\_ **KILLIAN SWIFT**

Active Ingredients:	
Sodium dichloro-s-triazinetriene, anhydrous.....	84.15%
Sodium Bromide .....	14.70%
Other Ingredients.....	1.15%
Total:.....	100.00%

[Available chlorine: 49.7%]

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

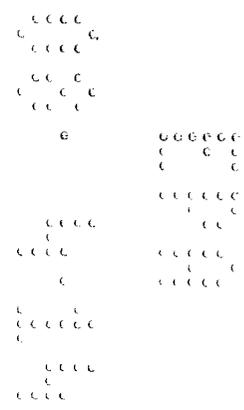
*{Note to reviewer: Although this product has a "Danger" signal word, as per the EPA label review manual "The Agency may permit reasonable variations in the placement of the First Aid statement as long as the reference statement, "See First Aid (or Statement of Practical Treatment) on (identify appropriate panel)" appears on the front panel." If the First Aid Statements are placed on the front panel of the final graphic label, the statement below will only reference Precautionary Statements:}*

**Read all Precautionary [and First Aid] Statements on [back] [side] [right] [left] panel before use.**

EPA Reg. No. 7364-103  
Superscript used in Lot No.  
EPA Est. No. \_\_\_\_\_

Net Wt. \_\_\_\_\_

[Manufactured by] {for} [Sold by]:  
GLB Pool & Spa, an Arch Chemicals, Inc. business  
1400 Bluegrass Lakes Parkway  
Alpharetta, GA 30004



**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER. Corrosive. Contamination or improper use may cause fire or explosion or the release of toxic gases. Do not mix this product with a small amount of water. Only add directly to your spa or hot tub. Do not allow product to contact any foreign matter, including other water treatment products. Do not add water to product. If product is exposed to small amounts of water, it can react to cause explosion or the release of toxic gases. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through the skin. May be fatal if inhaled.**

- Open in a well-ventilated area. Do not breath dust, vapor, or spray mist.
- Do not get in eyes, on skin or on clothing. Wear safety glasses, face shield or goggles and rubber gloves. For additional protection of skin, wear long sleeves and long pants.
- Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco or going to the toilet.
- Remove contaminated clothing and wash clothing before reuse.

**FIRST AID**

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present after 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for further treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for further treatment advice.

**IF SWALLOWED:** Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the Poison Control Center or doctor. Do not give anything by mouth to an unconscious person. Call a Poison Control Center or doctor immediately for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a Poison Control Center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

**IN CASE OF EMERGENCY CALL: 1-800-654-6911**

**PHYSICAL & CHEMICAL HAZARDS:**

**DANGER. Strong oxidizing agent. This product can increase fire intensity.**

**If product is exposed to small amounts of water, it can react violently to produce heat and toxic gas and spatter. Do not add water to this product. Always add product only into large quantities of water.**

- Do not allow to become wet or damp before use.

**Can react with other materials, including other water treatment products, to cause fire, explosion, and the release of toxic gases.**

- Keep all foreign matter, including other water treatment products, away from this product.
- Use only clean dry utensils to dispense this product.
- Do not allow this product to contact other water treatment products. [If used with a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in a skimmer.]
- Avoid spilling this product.

**Exposure to heat can cause this product to rapidly decompose, leading to fire, explosion, and the release of toxic gases.**

- Store in a cool, dry, well-ventilated area away from heat or open flame.
- Keep away from heat and from flame and burning material (like a lighted cigarette).

{Use first sentence of paragraph below for containers less than 50 lb.; use complete paragraph for all other sizes. 50 lbs. or larger}

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms.

Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**[WHY YOU SHOULD USE THIS PRODUCT:** [This [brand] product] is a sanitizer for [spa] [and] [hot tub] water. It rapidly and completely dissolves without cloudy or insoluble residue in water to provide effective bromine sanitization. [This brand product] may be used as a super oxidation treatment to rid [spa] [and] [hot tub] of organic waste.]

**DIRECTIONS FOR USE:**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ ALL PRECAUTIONARY STATEMENTS BEFORE USE**

**For [Spa] [or] [Hot Tub] Start up:**

To start up a new [spa] [or] [hot tub], or one recently drained:

- Clean all surfaces, backflush or clean the filter, chemically balance the calcium hardness and total alkalinity, treat for metals, if present (iron, copper and manganese), and adjust the pH to 7.2 – 7.8.

[For best results, see "WATER BALANCE" section before treatment. Turn on circulation system and ensure that it is operating properly.]

- Add 7.5 grams (1 ½ teaspoons) of this product per 300 gallons of water directly to the [spa] [hot tub] with the circulation system on. Measure bromine residuals after 15 minutes and repeat dosage until an active bromine concentration of [2 to 4 ppm in residential spas] [and] [3 to 6 ppm in commercial spas] is established. The presence of organic debris, high bather use and other factors may require a higher dosage.

- Use a [reliable test kit] [brand] [test kit] [or] [test strips] to monitor for bromine regularly. Do not allow cyanuric acid level to exceed 100 ppm. It is recommended that [spas] [and] [hot tubs] be drained every 30 – 90 days, more often if under heavy use.

**[Superoxidation] [Shock Treatment]:**

Water soluble, non-filterable wastes can accumulate in [spa] [or] [hot tub] water and cause dull or cloudy water and can stimulate algae growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment must be done on a regular basis to remove these wastes and maintain clear sparkling water.

- Add 30 grams (6 teaspoons) of this [brand] product per 300 gallons of water directly to the [spa] [or] [hot tub] with the circulation system on.

**Re-entry into treated [Spas] [or] [Hot Tubs] is prohibited above levels of 8 ppm bromine due to risk of bodily injury.**

**[For Spa] [or] [Hot Tub] Treatment of Visible Algae:**

For visible algae growth or slimy interior, add 30 grams (6 teaspoons) of this product per 300 gallons of water directly to the spa with the circulation on. The spa should be allowed to circulate for 15 – 20 minutes following treatment. For best results, spas containing heavy algae growth should be drained and cleaned prior to treatment. Treatment may be repeated in 24 hours if algae are still present.]

**[Water Balance:**

For best product performance, comfort and crystal clear water, use [HTH Spa® care][brand name] products to maintain the following water balance.

Acceptable Range for Balance

- pH 7.2-7.8
- Total Alkalinity 60-120 ppm
- Calcium Hardness Above 200 ppm
- Available Chlorine 3-5 ppm
- Total Bromine [2-4 ppm (for residential spas)] {or} [3-6 (for commercial spas)]
- 

**STORAGE & DISPOSAL:**

*{Non-refillable container} {Residential/household use}*

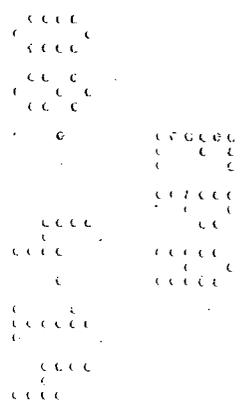
Keep product dry in a tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat and open flame. Avoid moisture getting into container. Keep off wet floors. Non-refillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. If not, discard in trash. For disposal of a contaminated or decomposing product, see "EMERGENCY HANDLING".

*{Non-refillable container} {Non-Household/Residential use}*

Keep this product in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat and open flame. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Non-refillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. For disposal of a contaminated or decomposing product, see "EMERGENCY HANDLING".

**EMERGENCY HANDLING:**

In case of contamination or decomposition, do not reseal container. Immediately remove container to an open and well-ventilated area by itself. Flood with large amounts of water. Dispose of the container and any contaminated material in an approved area.





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[HELPLINE TOLL FREE: 866-HTH-POOL]

[Call 7 days a week with your questions concerning spa water care. 8:00 am - 10:00 pm Eastern Time]

[Visit US: [www.hthpools.com](http://www.hthpools.com)]

[For more information, visit our website at [www.brillianceforspas.com](http://www.brillianceforspas.com)]

[(brand name/logo) [is a] [are] registered trademark[s] of Arch Chemicals, Inc.]

